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8 [Additional counsel appear on signature  
9 page]

10 *Attorney for Plaintiff and the Proposed  
11 Class*

12 **UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 JON ANTHONY CLARK, individually  
15 and on behalf of all others similarly  
16 situated,

17 *Plaintiff,*

18 *v.*

19 FREEDOM FOREVER LLC

20 *Defendant*

Case No.  
5:24-cv-01903-SSS-DTB

**PLAINTIFF'S  
RESPONSE TO THIS  
COURT'S ORDER**

**Date: August 1, 2025  
Time: 1:00 PM  
Held via Zoom videoconference**

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23 The Plaintiff files this response to the Court's Order of July 21, 2025. (ECF  
24 No. 44). The Plaintiff's response is brief because there is no "collusive or  
25 prejudicial to the putative class" settlement. Indeed, discovery revealed that any  
26 violative calls were made by a third party, and the Plaintiff has elected to potentially  
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1 pursue those entities. No settlement agreement was executed and no payment was  
2 exchanged.

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5 Dated: July 22, 2025

PARONICH LAW, P.C.

6 By: /s/Anthony I. Paronich  
7 Anthony I. Paronich [pro hac vice]

8 Attorney for Plaintiff  
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